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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EDGAR SOLIS,

Plaintiff,

v.

STATE OF CALIFORNIA;

MICHAEL BELL; and DOES 1-10,
inclusive,

Defendants.

Case No.: 5:23-cv-00515-HDV-JPR

[*Honorable Hernán D. Vera*]

Magistrate Judge Jean P. Rosenbluth

**JOINT STIPULATION TO MODIFY
THE SCHEDULING ORDER**

Jury Trial

Date: Tuesday, October 29, 2024

Time: 09:00 a.m.

Ctrm: 5B

350 West 1st Street, 6th Floor
Los Angeles, California 90012

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

By and through their counsel of record in this action, Plaintiff EDGAR SOLIS, and STATE OF CALIFORNIA (by and through California Highway Patrol), and MICHAEL BELL (collectively “Defendants”) (Plaintiff and Defendants together called “the parties”) hereby submit the following Joint Stipulation to Modify the Scheduling Order (Docs. 25):

1. On May 6, 2024, the parties filed their joint request for modification of the scheduling order regarding fact discovery and expert discovery. (Doc. 45.)

2. On May 15, 2024, the Court granted the parties’ stipulation, in relevant part extending the expert discovery cut-off to June 28, 2024. (Doc. 48.)

3. For over the last approximate week, Defense counsel Mr. Klehm has been recovering from COVID and Plaintiff’s counsel Mr. Sincich has been recovering from the flu. Additionally, Plaintiff’s counsel Mr. Galipo started trial in Las Vegas, NV on June 17, 2024 and is expected to return on or about June 27, 2024 (*Lawrence, et al v. LVMPD, et al.*, Case No. 2:16-cv-03039-APG-NJK).

4. Further, Defendants experts’ soonest availability for deposition is in mid to late July and one in August.

5. Additionally, the current deadline to complete the settlement conference is August 23, 2024. (Doc. 25.)

6. The parties believe that mediation will be more productive after the parties have completed the expert depositions. The parties are in discussions regarding scheduling mediation in this matter for early September, with the Court’s permission.

7. Therefore, with the Court’s permission, the parties are scheduling the deposition of Defendants’ experts to be conducted on or before the following: Mr. Meyer for July 15; Mr. Ward for July 25; Dr. Ritter for July 26; and Dr. Kvitne for August 20, 2024; and Plaintiff’s expert are scheduled to be conducted on or before

the following: Mr. Clark for July 19; Mr. Adams for July 31; and Dr. O'Connor for August 10.

8. No other dates and deadlines will be affected by granting this Stipulation.

9. This is the Parties third request for any modification to the scheduling order in this action.

STIPULATION FOR CONTINUANCE:

10. Accordingly, in light of the foregoing, and in order to facilitate the interests of all parties to this action, by and through their counsel of record in this action, the parties hereby Stipulate that **Good Cause** exists, and the parties respectfully request that the Court **modify the Scheduling Order as follows:**

- To continue the **Expert Discovery Cut-Off**, from June 28, 2024 to **August 23, 2024**.
- To continue the **Deadline to Complete Settlement Conference** date from August 23, 2024 to **September 13, 2024**.

IT IS SO STIPULATED.

Respectfully Submitted,
DATED: June 27, 2024

**LAW OFFICES OF DALE K. GALIPO
LAW OFFICES OF GRECH & PACKER**

By: /s/ Marcel F. Sincich
Dale K. Galipo
Marcel F. Sincich
Trent C. Packer
Attorney for Plaintiff

DATED: June 27, 2024

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By: /s/ David Klehm
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(by and through the California Highway
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